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COUNSEL/PARTIES OF RECORD		
JAN 14 2015		
CLERK US DISTRICT COURT		
DISTRICT OF NEVADA		
BY:		DEPUTY

9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 MOSESE TAUNAHOLO,

16 Defendant.

3:15-CR-0004-HDM-VPC

17 INDICTMENT FOR VIOLATION OF:

18 TITLE 8, UNITED STATES CODE,
19 SECTION 1253(a)(1)(C) – Willful Failure to
20 Depart from the United States

21 THE GRAND JURY CHARGES THAT:

22 On or about December 2, 2014, in the District of Nevada, MOSESE TAUNAHOLO, defendant
23 herein, an alien against whom a final order of removal was outstanding by reason of being a member of
24 the class of deportable aliens described in Title 8, United States Code, Section 1227(a)(2)(A)(iii), did
willfully take action designed to prevent and hamper his departure from the United States pursuant to
such order, to wit: he refused to board a scheduled flight at the Reno Tahoe International Airport in

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1 Reno, Nevada by lying down on the floor at the airport and failing to cooperate with United States
2 immigration enforcement agents; all in violation of Title 8, United States Code, Section 1253(a)(1)(C).

3 A TRUE BILL:
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6 FOREPERSON OF THE GRAND JURY
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